

**United States Bankruptcy Court  
District Of New Jersey**

Caption In Compliance With D.N.J. LBR  
9004-1

**Trif & Modugno LLC**

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*Counsel for Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A.); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.); Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company; Starr Indemnity & Liability Company (as successor in interest to Republic Insurance Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policies subscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark); and RheinLand Versicherungen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen)*

In Re:

LTL Management LLC,

Debtor.

Chapter 11  
Case No. 23-12825 (MBK)

Judge: Hon. Michael B. Kaplan

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS**

**PLEASE TAKE NOTICE** that Trif & Modugno, LLC (“T&M”), acting by and through **Louis A. Modugno, Esq.** hereby appears in the above-captioned case as co-counsel for Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d’Assurances S.A.); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.); Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company; Starr Indemnity & Liability Company (as successor in interest to Republic Insurance Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policies subscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark); and RheinLand Versicherungen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen) (collectively, the “New Jersey Coverage Action Plaintiff-Insurers”), and requests, pursuant to Federal Rules of Bankruptcy Procedure 2002, 9007, and 9010(b), that copies of all notices, documents and pleadings given or filed in the above-captioned case be given and served upon:

Louis A. Modugno, Esq.  
Trif & Modugno, LLC  
89 Headquarters Plaza  
North Tower, Suite 1201  
Morristown, New Jersey 07960  
Telephone: (973) 547-3611  
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**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request,

whether formal or informal, written or oral and whether transmitted or conveyed by mail, e-mail, facsimile, telephone, telegraph, or otherwise filed or made with regard to the above-captioned case and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive the New Jersey Coverage Action Plaintiff-Insurers': (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which the New Jersey Coverage Action Plaintiff-Insurers are or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

**DOCUMENTS:**

- All notices entered pursuant to Fed. R. Bankr. P. 2002.
- All documents and pleadings of any nature, including claim objections.

Respectfully submitted,

**Trif & Modugno, LLC**

Dated: April 10, 2023

/s/ Louis Modugno  
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